

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Michael & Hedy Damico	:	
	:	
Debtor s	:	No.: 19-16261AMC

OBJECTION TO CERTIFICATION OF CARRINGTON MORTGAGE
SERVICES, LLC et al

COMES NOW, Debtor, Michael & Hedy Damico, hereinafter referred to as “Debtors,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Certification of Default by Carrington Mortgage Services, LLC “Movant”, and hereby Objects and avers the following:

1. Denied. By way of further response, if Debtors are behind they intend to immediately become current on any amount owed pertaining to the stipulation of the Motion for Relief, prior to a hearing on the Certification of Default.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order granting Relief of the Automatic Stay under Bankruptcy Code Section 362

Respectfully submitted,

Dated: December 4, 2020

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
Wanda Arjona-Perez :
: :
Debtor s : No.: 18-12382MDC

ORDER

AND NOW, this _____ day of _____, 2019, it is hereby ORDERED and
DECREEED that the Movant's Motion for Relief from Automatic Stay under Bankruptcy
Code Section 362(a) is DENIED

FURTHER ORDERED:

Chief Judge Magdeline D. Coleman

UNITED STATES BANKRUPTCY COURT
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IN RE: :
Wanda Arjona-Perez :
: :
Debtor s : No.: 18-12382MDC

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Objection to the Certification of Default of Stipulation by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller
Chapter 13 Trustee
111 S. Independence Mall
Suite 583
Philadelphia, PA 19106

Peter E. Meltzer, Esquire
2000 Market Street, 13th Floor Philadelphia, PA 19103
Electronic Notice

Dated: December 4, 2020

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA
19107